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18 Attorneys for Defendant

19  
20 **UNITED STATES DISTRICT COURT**  
21  
**DISTRICT OF NEVADA**

22 NAVAJO HEALTH FOUNDATION – SAGE  
23 MEMORIAL HOSPITAL, INC. (doing  
24 business as “Sage Memorial Hospital”); an  
25 Arizona non-profit corporation,

26 Plaintiff,

27 v.

28 RAZAGHI DEVELOPMENT COMPANY,  
29 LLC; a Nevada limited liability company  
30 (doing business as “Razaghi Healthcare”),  
31 AHMAD R. RAZAGHI; individually, TAUSIF  
32 HASAN; individually, DOES 1-10; ROES A-Z;

33 Defendants.

34 Case No. 2:19-cv-00329-GMN-EJY

35  
**~~STIPULATION AND ORDER TO~~**  
**~~EXTEND TIME TO RESPOND TO~~**  
**~~COMPLAINT~~**

36  
**(First Request)**

37 IT IS HEREBY STIPULATED AND AGREED that Defendants shall have an extension  
38 of time up to and including June 5, 2020 to answer or otherwise respond to Plaintiff’s Complaint  
39 for Money Damages and Emergency Injunctive Relief (“Complaint”). The parties have so  
40 stipulated because defense counsel was recently retained and requires additional time to confer

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1 with witnesses and review relevant documents concerning the allegations set forth in the  
2 Complaint. This is the first request to extend this deadline and the first request since withdrawal  
3 of Defendants' request to compel arbitration.

4 RESPECTFULLY SUBMITTED this 8th day of May 2020.  
5

6 FISHER & PHILLIPS LLP

PAUL PADDA LAW, PLLC

7 By /s/ Brian L. Bradford

By /s/ Paul S. Padda

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10 IT IS SO ORDERED:  
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12   
UNITED STATES MAGISTRATE JUDGE

13 Dated: May 8, 2020

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